

June 19, 2015

Via E-mail and Certified Mail,

Return Receipt Requested #9414 7266 9904 2038 5104 57

Ms. Shelia M. Hollimon
Special Assistant to Associate Director/Engineer
Office of Environmental Accountability
U.S. Environmental Protection Agency – Region 4
Sam Nunn Atlanta Federal Center
61 Forsyth Street, N.W.
Atlanta, GA 30303

Re: Request for Documents Pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552 *et seq.*: Borden Dairy Company of Florida, LLC (fka LaLa USA), 1000 6TH Street SW, Winter Haven, FL 33880 - Voluntary Self-Disclosure Docket No. 04-2012-9106; TRI FID: 33880VLDR10006

Dear Ms. Hollimon:

As you requested during our telephone conversation yesterday, Thursday, June 18, 2015, I hereby confirm in writing that I represent Borden Dairy Company and its various operating entities, which include the above-captioned Winter Haven, Florida, milk processing facility (“Facility”). In addition, I had understood that due to the nature of the limited information I seek, you had asked that I direct to you the request for information I set out below.

During our call, I explained that I need to determine that my client and I possess all documentation that relates to the Facility’s voluntary self-disclosure to Region IV of the Environmental Protection Agency (the “Region”) it made on or about November 1, 2011. The client made that self-disclosure pursuant to the *Incentives for Self-Policing: Discovery, Disclosure, Correction and Prevention of Violations*: 65 Fed. Reg. 19618, April 11, 2000 (“Audit Policy”). The Region assigned the following docket number to the self-disclosure in question: Voluntary Self-Disclosure Docket No. 04-2012-9106.

Because of that need, I respectfully request that the Region, and any other Environmental Protection Agency (“EPA”) Agency office that may possess records that are responsive to this request, provide me with any and all records that relate to the Facility and its entry into the Agency’s voluntary self-disclosure program. In the event that I am mistaken in my recollection that you are the appropriate Regional official to whom I should direct this request, would you kindly either forward this letter to such person, if that is appropriate, or contact me so that I may repeat this request to such person?

Austin Office

816 CONGRESS AVENUE, SUITE 1500
AUSTIN, TEXAS 78701
TEL - 512.476.6300
FAX - 512.476.6331

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The information I seek herein constitutes "records" as the term is defined at 40 CFR § 2.100(b), which records have been generated up to the date of this request. That term includes hard copy documents (both hand-written notes, telephone logs, and type-script materials) as well as electronic media that encompass e-mail messages, documents on computer hard drives and/or on portable digital media storage devices,.

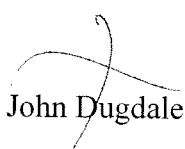
Should it expedite matters, or should the Region require it, my client will reimburse the Region at the current cost per page for document reproduction and shipping.

In the event that you deny in whole or in part this request, I respectfully request, pursuant to 40 CFR § 2.113(d)(1), that the Agency identify the records withheld and state the basis for denial for each record or category of records being withheld.

Please do not hesitate to contact me at the number set out in the letterhead to discuss the most efficient manner to handle this request; I presume there are a limited amount of public records in the Region's or other Agency entity's possession that are responsive to this request.

Thank you again for the courtesies you extended to me yesterday.

Very truly yours,



John Dugdale

cc: Darla Roden, Esq., Borden Dairy Company